

## COVINGTON

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Via ECF

August 12, 2025

The Honorable Lorna G. Schofield  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *McCutcheon, et al. v. Colgate-Palmolive Co. et al.*, No. 16-Civ-4170 (LGS)

Dear Judge Schofield:

I write jointly on behalf of Plaintiffs and Defendants to respectfully request a brief, eleven-day, extension of the Court's August 18, 2025 deadline to file a motion for preliminary approval of class action settlement. ECF No. 329.

As previously reported, the parties reached an agreement to settle this long-running matter in principle with the assistance of mediator Marc Isserles of JAMS. *See* ECF No. 328. At that time, the parties established a target date of August 15, 2025 by which to execute a formal settlement agreement, including a spreadsheet memorializing the estimated settlement benefits due to each of the approximately 1,200 class members, and a date of August 18, 2025 to file a motion for preliminary approval. *See id.*

Since that time, the parties have been working collaboratively towards that goal. They have been in continuous communication about the details of the settlement agreement and class member calculations, including exchanging multiple drafts of spreadsheets and documents, and are working together towards finalizing the settlement agreement and its attachments and exhibits.

However, given the complex nature of this matter, the parties believe that additional time is needed to finalize the settlement agreement and calculation spreadsheet, and file for preliminary approval. We therefore respectfully request that the Court continue its deadline to submit the motion for preliminary approval of settlement in this matter from August 18, 2025 to August 29, 2025.

Respectfully submitted,

/s/ Robert S. Newman

Robert S. Newman

cc: Plaintiffs' Counsel

Application **GRANTED**. The deadline to file the motion for preliminary approval of settlement is extended from August 18, 2025, to **August 29, 2025**.

Dated: August 13, 2025  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE